



June 8th, 2011

Serena Sweet
U.S. Army Corps of Engineers, Project Manager
P.O. Box 6898 (CEPOA-RD), JBER, AK 99506-0898
(907) 753-5567 Fax

Dear Ms. Sweet:

On behalf of the Native Village of Tyonek- IRA Council I submit the following list of requested changes to the outline (table of contents) for the Draft and Preliminary SEIS for the proposed Chuitna Coal Mine. This list maybe expanded in the future. Please accept this list of requested changes to the outline from NVT / IRA Council as both a Cooperating Agency and as a formal request from our Federally Recognized Tribal Government. We request that all the items below be integrated and fully addressed in the SEIS documents or provide a complete explanation in writing; describing why an item is not being considered for inclusion. The list of requested changes follows:

1: Climate Change

Projections / Potential Implications:

- For the Chuitna River Watershed
- For surrounding area
- For Cook Inlet
- For Salmon populations
- Climate Change forecasts on Proposed project and salmon stream restoration
- For watershed vulnerability

2: Global and Local Realities:

- How does project contribute to Climate Change by Considering Carbon output from mine? (including methane released during mining operations and resulting wetland disturbances.)

3: Mercury

- Cumulative Impacts from combustion of coal
- Potential impacts on salmon, moose, and all migratory and resident species of fish, game and habitat.

4: Social Impacts (not to be mistaken with Socioeconomic section)

5: Salmon Stream / River Restoration

- Examples of successful Salmon Habitat Restoration from projects On the same scale of the proposed project.
- Overview of the state of the Salmon populations within a 75 mile radius of Tyonek

6: Power Generation and Energy Needs and Impacts

- Summary of Energy needs of project
- Estimate of power usage and its impacts on railbelt and natural gas during peak winter demands

7: Air Traffic and Safety:

- Potential Impacts on the safety of Alaska airways caused by explosions and coal dust in the air?
- Summary of Regulatory Concerns and Issues

8: EIS vs. SEIS

- Why is the SEIS process occurring when the EIS is 21 years old from 1990?

9: Cook Inlet Residents:

- Potential Impacts on the Anchorage Community
- Potential Impacts on Cook Inlet Residents
- Potential Impacts on Tribes in the Cook Inlet

10: Coal Dust Impacts

- Impacts on Moose Health and Habitat
- Impacts on Chuitna Watershed
- Impacts on the Cook Inlet
- Impacts on Migratory and Resident Bird Populations
- Impacts on Migratory and Resident Fish Populations
- Impacts on Human Health

- Statewide impacts
- Impacts on the Cook Inlet
- Impacts on Anchorage population
- Impacts on wild Alaska salmon marketing and sales from Cook Inlet set-netters
- Impacts on berries, and all medicinal and edible plants

11: Human Health Impacts:

- Cancers and Leukemia
- Respiratory Problems
- Information from residents living near other Mines of a similar size.

12: Shipping in the Cook Inlet

- Potential impacts of shipping in the Cook Inlet
- Emergency Response Plan
- Habitat Impacts
- Shipping Plan for operating in hazardous waters shipping impacts on commercial drift and set net fishermen.

13: Migratory and Resident Bird Populations:

- Potential impacts of proposed mine

14: Migratory and Resident Fish Populations:

- Potential impacts on subsistence and commercial populations From proposed mine.

15: Examples:

- Summary of health problems of residents living near large scale Coal Strip mines of a similar scale
- Summary of impacts on fish and game near large scale Coal Strip mines Of a similar scale
- Examples of Successful Salmon Restoration of a similar situation after removing habitat and mining 350ft.

16: Pac Rim, Barrick and Mines in area:

- Cumulative assessment of impacts from existing and future leases
- If coal is being used in state then to whom? if it is for proposed projects then where?

17: Alternatives to proposed project:

- Alternatives should include: not mining though middle creek--150 foot buffer not mining on the Chuitna River and not on the 100 tributaries.⁴

18: Impact of potential new dock

- Critical habitat impacts

19: Impacts of the proposed conveyer belt

Sincerely

President Frank Standifer III



Serena Sweet
U.S. Army Corps of Engineers, Project Manager
P.O. Box 6898 (CEPOA-RD), JBER, AK 99506-0898
(907) 753-5567 Fax

June 29th, 2011

Dear Ms. Sweet:

On behalf of the Native Village of Tyonek- IRA Council I submit the following additional three items as requested changes to the outline (table of contents) for the Draft and Preliminary SEIS for the proposed Chuitna Coal Mine.

The three requested additions follow: (Please note that our previous requests are still desired) .

Viewshed:

- Assess the impacts on the traditional viewshed of the Native Village of Tyonek, Anchorage Communities and on tourism in Alaska.

Noise-shed:

- Impacts of Fish and Game
- Impacts on the community of Beluga
- Impacts on the Native Village of Tyonek

Cumulative Impacts

- A complete summary of cumulative impacts of the proposed project on the Native Village of Tyonek, the Cook Inlet, State of Alaska, and on Fish and Game

In addition, the Native Village of Tyonek - IRA Council as a cooperating agency and a sovereign Tribal Government officially will appoint a representative, to the Draft Water Management Planning Subgroup. We will submit our appointee name in the near future.

Sincerely

President Frank Standifer III

Native Village of Tyonek – Requested Changes to Chuitna Coal Project SEIS Outline

Topics Identified in NVT Letters		USACE Response
Letter of June 8, 2011		
1. Climate Change	1a Chuitna River watershed	Carbon dioxide and other potential greenhouse gas (GHG) emissions will be considered in the SEIS air quality analysis (Section 3.1). No on-site or local coal combustion is proposed; however, the sale of Chuitna coal to Asian markets would contribute to future GHG emissions at the location where the coal is burned (although this may not increase GHG emissions as it would replace other coal combustion.) The SEIS will consider the contribution of the project to <u>cumulative</u> global GHGs in the air quality section of the SEIS (Section 3.1.) Note: The SEIS will not attempt to quantitatively forecast the degree of future "climate change."
	1b Surrounding area	See response to 1a.
	1c Cook Inlet	See response to 1a.
	1d Salmon populations	See response to 1a.
	1e Forecasts on proposed project and salmon stream restoration	See response to 1a.
	1f Watershed vulnerability	See response to 1a.
2. Global and Local Realities	2a Project's contribution to climate change, including carbon output and methane released during mining	See response to 1a regarding "climate change." Also, the geology (Section 3.2) and air quality (Section 3.1) sections of the SEIS will review the available data for coalbed methane in the Beluga coal field to assess the likelihood and potential degree of methane release during mining.
3. Mercury	3a Cumulative impacts from coal combustion	See response to 1a. Depending on the customer market for Chuitna coal and the alternative coal sources for

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		that market, the use of coal from the proposed Chuitna Coal Project may or may not affect (either increase or decrease) mercury emissions at the location of coal combustion. The SEIS will quantitatively project the cumulative change in mercury emissions per ton of coal burned in comparison to other major coal sources based on available data.
	3b Impacts on salmon, moose, and all migratory and resident species of fish, game, and habitat.	See response 3a. Additionally, mercury toxicities from airborne sources are generally not a major issue to various fish and wildlife species. Such species, however, may bioaccumulate mercury in tissues that then may become an issue for human health (Section 3.21 of the SEIS) when the tissue is consumed.
4. Social Impacts		Social impacts will be addressed in Section 3.14, Socioeconomics.
5. Salmon Stream/River Restoration	5a Examples of successful salmon restoration – projects of similar scale	The potential for stream restoration and re-establishment of a salmon population in Stream 2003 will be assessed in Section 3.9 (Freshwater Aquatic Ecology) on the basis of the most relevant available literature and data from analogous projects.
	5b Overview of salmon populations within 75-mile radius of Tyonek	The cumulative effects study area for freshwater fisheries in the SEIS includes the potentially affected drainages for the various alternatives (i.e., the Chuit River and its tributaries, Three Mile Creek, Tyonek Creek, and Old Tyonek Creek). Relevant available literature and data for populations in the cumulative

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		effects study area will be considered in the analysis in Section 3.9, Freshwater Aquatic Ecology. Salmon populations outside of these drainages would not be affected by the project or the alternatives.
6. Power Generation and Energy Needs and Impacts	6a Summary of project energy needs	Power/energy requirements for the project will be addressed in the description of the Proposed Action (Chapter 2).
	6b Estimate of power usage and impacts on railbelt and natural gas during peak winter demands	See response to 6a.
7. Air Traffic and Safety	7a Impacts on Alaska air safety caused by explosions and coal dust	Fugitive dust from mining operations will be addressed in the SEIS under Air Quality (Section 3.1).
	7b Summary of regulatory concerns and issues	Air traffic to and from the Chuitna Coal Project landing strip (or Beluga airstrip, if considered as an alternative) will be assessed in Land Use, Access, and Recreation (Section 3.13) relative to potential impacts to existing air traffic in the Cook Inlet region.
8. EIS vs. SEIS	8a Why an SEIS when the EIS is 21 years old?	The USACE has determined that a SEIS is appropriate. The current proposed project is similar to the original proposal in that it is the same type of project located in the same project area. The Chuitna SEIS will be a standalone analysis document; the original EIS information and conclusions will be taken into account in the decision-making process.
9. Impacts to Cook Inlet Residents	9a Anchorage Community	Impacts to local residents (including Anchorage residents) will be addressed where appropriate in the SEIS under discussions of

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		socioeconomic (including lifestyle) effects (Section 3.14), subsistence (Section 3.16), and health impacts (Section 3.21).
	9b Cook Inlet Residents	See response to 9a.
	9c Tribes in Cook Inlet	See response to 9a.
10. Coal Dust Impacts	10a Moose health and habitat	Fugitive dust from mining and coal loading operations will be addressed in the SEIS under Air Quality (Section 3.1), and the effects of dust on environmental resources will be addressed in the specific sections related to such resources, as appropriate.
	10b Chuitna Watershed	See response to 10a.
	10c Cook Inlet	See response to 10a.
	10d Migratory and resident bird populations	See response to 10a.
	10e Migratory and resident fish populations	See response to 10a.
	10f Human health	See response to 10a. Also, fugitive dust from mining and coal loading operations will be addressed in the health impact assessment in Section 3.21.
	10g Statewide impacts	See response to 10a. Also, fugitive dust from the mining and coal loading operations is expected to be a local issue, not a state-wide issue. It will be addressed in the SEIS, as appropriate to the impacts.
	10h Cook Inlet	See response to 10a.
	10i Anchorage populations	See response to 10f.
	10j Wild salmon marketing and sales from Cook Inlet set netters	See responses to 10a and 10f.
	10k Berries and all medicinal and edible plants	See responses to 10a and 10f.
11. Human health impacts	11a Cancers and leukemia	The health impact assessment (Section 3.21) will address the applicable potential health effects associated with the proposed project and alternatives.
	11b Respiratory problems	See responses to 11a and 10f.
	11c Information from residents	The SEIS will reference

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	near other mines of similar size	technical literature and documented observations from similar operations, as appropriate and available.
12. Shipping in Cook Inlet	12a Shipping in Cook Inlet	The SEIS will address potential impacts (including cumulative) to marine resources (mammals, fisheries, and birds in Sections 3.11, 3.12, and 3.8, respectively) associated with Chuitna coal shipments.
	12b Emergency response plan	The emergency response plan for the project will be addressed in the description of PRC's Proposed Action (Chapter 2).
	12c Habitat impacts	See response to 12a.
	12d Shipping plan for operating in hazardous waters	See response to 12b.
	12e Shipping impacts on commercial drift and set net fisherman	Impacts of ship and barge traffic will be addressed in Section 3.12, Marine and Commercial Fisheries.
13. Migratory and resident bird populations	13a Impacts of proposed mine	The SEIS will address potential impacts of mining operations on applicable environmental resources within the specific sections related to those resources.
14. Migratory and resident fish populations	14a Impacts on subsistence and commercial populations of proposed mine	See response to 13a.
15. Examples	15a Health problems of residents near similar large-scale coal mines	See response to 11c.
	15b Impacts on fish and game near similar large-scale coal mines	See response to 13a. The SEIS will reference technical literature and documented observations from similar operations, as appropriate and available.
	15c Successful salmon restoration of similar situation after removing habitat and mining 350 feet	See response 5a.
16. PacRim, Barrick, and mines in area	16a Cumulative impacts from existing and future leases	The SEIS will evaluate potential cumulative effects relative to identified past, present, and reasonably

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		foreseeable future actions, including development of nearby mine leases which will be analyzed in Section 3.2, Geology and Physiography.
	16b In-state destination of coal	PRC is not proposing the sale of Chuitna coal to an in-state customer; therefore, this does not represent a realistic scenario to be considered.
17. Project alternatives	17a Include alternative of not mining through Middle Creek	The no-action alternative will address not mining through Middle Creek.
	17b Include alternative of 150-foot buffer of Middle Creek	See response to 17a.
	17c Include alternative of not mining on Chuit River	PRC's Proposed Action or an alternative does not involve mining on the Chuit River or direct disturbance of the river.
	17d Include alternative of not on the 100 tributaries	The no-action alternative will address not mining through tributaries.
18. Impacts of new dock	18a Impacts to critical habitats	The SEIS will address effects of the proposed bulkhead and coal loading facilities on: Marine and Commercial Fisheries (Section 3.12), Marine Mammals (Section 3.11), and Marine Birds (in Section 3.8, Wildlife).
19. Impacts of conveyor belt	19a Impacts of conveyor belt	Potential impacts of the overhead conveyor system will be evaluated in applicable resource sections of the SEIS.
Letter of June 29, 2011		
20. View shed	20a Impact on traditional view shed of NVT	Section 3.18, Visual Resources, will address impacts of PRC's Proposed Action and alternatives on viewsheds in the project vicinity.
	20b Impacts on Anchorage communities	See response 20a.
	20c Impacts on Alaska tourism	See response 20a.
21. Noise shed	21a Impacts on fish and game	Section 3.19, Noise, in the SEIS will address noise-related impacts of PRC's Proposed

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		Action and alternatives on noise-sensitive receptors in the project vicinity; Section 3.8, Wildlife, will consider noise impacts to wildlife. Underwater noise effects on marine mammals will be analyzed in Section 3.11.
	21b Impacts on community of Beluga	See response 21a.
	21c Impacts on NVT	See response 21a.
22. Cumulative impacts	22a NVT	The SEIS will evaluate potential cumulative effects for all resources relative to identified past, present, and reasonably foreseeable future actions.
	22b Cook Inlet	See response 22a.
	22c State of Alaska	Potential cumulative impacts associated with the mining and coal loading operations will be evaluated for resources based on the identified resource-specific cumulative effects study areas.
	22d Fish and game	See response 22a.